

## BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL CHAIRMAN JIM IRVIN COMMISSIONER MARC SPITZER COMMISSIONER

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Arizona Corporation Commission

DOCKETED

AUG 0 1 2002

DOCKETED BY

DOCKET NO. RT-00000H-97-0137

MOTION TO CONSOLIDATE

IN THE MATTER OF REVIEW AND POSSIBLE REVISION OF ARIZONA UNIVERSAL SERVICE FUND RULES.

Citizens Communications Company, Navajo Communications Company, Inc., Citizens Telecommunications Company of White Mountains, Inc., dba Frontier Communications of White Mountains and Citizens Utilities Rural Company, Inc., dba Frontier Citizens Utilities Rural (collectively, "Citizens"), hereby moves the Arizona Corporation Commission ("Commission") pursuant to A.A.C. R14-109(H) to consolidate Docket No. RT-00000H-97-0137 with Docket No. T-00000D-00-0672, In the Matter of the Investigation of the Cost of Telecommunications Access. The issues in each docket are substantially related and that the rights of all parties of record will not be prejudiced by such procedure.

Further, Citizens requests that Commission issue an Order requiring all parties of record to provide copies of all filings to all parties on the service list.

WHEREFORE, for all the foregoing reasons:

Citizens respectfully requests that the Commission issue an order granting this Motion to Consolidate.

Further, Citizens requests that the Commission issue an order requiring all parties of record to provide copies of all filings to all parties on the service list.

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1	RESPECTFULLY SUBMITTED this 13th day of August, 2002.
2	CHEITETZ & JANNITELLI, P.C.
3	Add Alltondot
4	By Sieven Westers
5	John C. Marcolini Robert J. Metli
6	3238 North 16 <sup>th</sup> Street Phoenix, Arizona 85016
7	Attorneys for Citizens Communications Company
8	
9	Original and eighteen (18) copies of the foregoing filed this 1st day of August, 2002, with:
10	Docket Control A DIZONA CORPORATION COMMISSION
11	ARIZONA CORPORATION COMMISSION 1200 West Washington Street
12	Phoenix, Arizona 85007
13	Copies of the foregoing hand-delivered this 1st day of August, 2002, to:
14	Lyn Farmer, Chief Hearing Officer ARIZONA CORPORATION COMMISSION
15	1200 West Washington Street Phoenix, Arizona 85007
16	Chris Kempley, Chief Counsel
17	Legal Division ARIZONA CORPORATION COMMISSION
18	1200 West Washington Street Phoenix, Arizona 85007
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20	Ernest Johnson, Director Utilities Division
21	ARIZONA CORPORATION COMMISSION 1200 West Washington Street
22	Phoenix, Arizona 85007
23	All parties of record on the service list
24 (	
25	By Julie By
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